

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA
CASE NO. 09-01

INQUIRY CONCERNING A JUDGE NO. 09-01
RE: JUDGE N. JAMES TURNER S. Ct. Case No. 09-1182

**FLORIDA JUDICIAL QUALIFICATIONS COMMISSION'S RESPONSE
AND OBJECTIONS TO RESPONDENT'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

The Florida Judicial Qualifications Commission (the "JQC"), hereby responds to Respondent, N. James Turner's First Request for Production of Documents, pursuant to and in accordance with Fla. R. Civ. P. 1.350, as follows.

DEFINITIONS AND INSTRUCTIONS

The JQC objects to the definition and instructions to the extent they seek to impose obligations not imposed by the Florida Rules of Civil Procedure, the Florida Judicial Qualification Rules or other controlling law or seek to improperly invade the attorney-client privilege, work product immunity or other applicable privileges and immunities.

SPECIFIC REQUESTS

1. The JQC has or will produce documents responsive to this request to the extent it has not already done so representing substantive

evidence the JQC may or will seek to introduce into evidence at the trial of this case to this request at a time and place to be agreed upon by counsel.

2. The JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not done so, at a time and place to be agreed upon by counsel.

3. The JQC objects to this request to the extent it seeks to improperly invade the attorney-client privilege, work product immunity or other applicable privileges and immunities. Subject to the foregoing objections, the JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not already done so, at a time and place to be agreed upon by counsel.

4. The JQC objects to this request to the extent it seeks to improperly invade the attorney-client privilege, work product immunity or other applicable privileges and immunities. Subject to the foregoing objections, the JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not already done so, at a time and place to be agreed upon by counsel.

5. The JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not

done so, at a time and place to be agreed upon by counsel.

6. The JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not done so, at a time and place to be agreed upon by counsel.

7. The JQC will produce documents responsive to this request in its possession or subject to its control to the extent they exist and it has not done so, at a time and place to be agreed upon by counsel.

8. The JQC objects to this request as overly vague and indeterminate. The JQC also objects to this request to the extent it seeks to improperly invade the attorney-client privilege, work product immunity or other applicable privileges and immunities. Subject to the foregoing objections, the JQC will produce documents responsive to this request to the extent they exist and are in the JQC's possession or subject to its control to the extent it has not already done so, at a time and place to be agreed upon by counsel.

[Signatures appear on next page]

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via E-Mail and U.S. Mail to Barry Rigby, Esquire, Law Offices of Barry Rigby, P.A., 934 North Magnolia Avenue, Suite 319, Orlando, Florida 32803 on this ____ day of _____, 2009.

Attorney